

STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No. 7619

Petition of National Mobile Communications,)
Inc., d/b/a Sovernet Communications, for)
designation as an Eligible Telecommunications)
Carrier in areas served by non-rural telephone)
companies under the Telecommunications Act)
of 1996)

Order entered: 4/15/2011

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I. SUMMARY

For a telecommunications carrier to receive federal universal service support, it must first be designated as an "Eligible Telecommunications Carrier" ("ETC"). Under federal law, the Vermont Public Service Board ("Board") is responsible for designating ETCs in Vermont. Consistent with a stipulation, this Proposal for Decision recommends that the Board designate National Mobile Communications Corporation, d/b/a Sovernet Communications ("Sovernet", "Company", or the "Petitioner"), as an Eligible Telecommunications Carrier through December 31, 2012, within a service area consisting of 92 wire centers.

This Proposal for Decision recommends adoption of a stipulation among three of the four parties to the Docket and conditions contained in that stipulation, including those relating to customer deposits, disconnections and service quality. It also recommends that the Board impose an additional condition not covered by the stipulation; namely, that Sovernet be required to advertise the availability of the Lifeline and Link-Up programs in media of general distribution in the requested designation area, and in a manner that is reasonably likely to alert qualified individuals to the existence of these programs.

II. PROCEDURAL HISTORY

On April 5, 2010, Sovernet petitioned the Board to designate it as an ETC in areas served by non-rural telephone companies in Vermont, pursuant to Section 214(e)(2) of the Telecommunications Act of 1934, as amended (the "Act"),¹ and Section 54.201 of the Federal Communications Commission's ("FCC") rules.² The area for which Sovernet seeks designation consists of the wire centers served by Telephone Operating Company of Vermont LLC, d/b/a FairPoint Communications ("FairPoint"), which are shown in Attachment A to this Order. Sovernet filed a memorandum in support of its petition.

The Board appointed John J. Cotter, Esq., as Hearing Officer and a prehearing conference was held on June 2, 2010. Sarah Hofmann, Esq., and Louise C. Porter, Esq., appeared on behalf

1. 47 U.S.C. § 214(e)(2).

2. 47 C.F.R. § 54.201.

of the Department of Public Service ("Department" or "DPS"). Paul J. Phillips, Esq., Primmer Piper Eggleston & Cramer PC, appeared on behalf of Franklin Telephone Company, Ludlow Telephone Company, Northfield Telephone Company, Perkinsville Telephone Company, Shoreham Telephone Company, Topsham Telephone Company, Inc., Vermont Telephone Company, Inc., d/b/a VTel, and Waitsfield-Fayston Telephone Company, Inc., d/b/a Waitsfield Telecom, d/b/a Champlain Valley Telecom ("WCVT") (together, the "Independents"). Beth Fastiggi appeared on behalf of FairPoint. Lawrence Lackey appeared on behalf of the Petitioner.³

The Independents and FairPoint each filed a motion to intervene and, by Order entered July 8, 2010, both were granted permissive intervenor status pursuant to PSB Rule 2.209(B).

Consistent with the schedule established for the Docket, Sovernet prefiled testimony on June 16, 2010. The Department and the Independents filed discovery upon Sovernet. Thereafter, the Department and the Independents prefiled testimony. FairPoint did not serve discovery on the other parties, nor file any testimony.

A single day of technical hearings was originally scheduled for September 16, 2010. However, a number of revisions to the schedule were made to accommodate requests by either Sovernet or the Independents, culminating in an October 4, 2010, request from Sovernet asking that the schedule again be extended to allow the parties an opportunity to pursue a negotiated settlement. All parties consented to the requested extension.

On December 14, 2010, Sovernet filed a copy of a proposed Stipulation and Agreement signed by Sovernet, the Independents and the Department ("Stipulation"). The parties to the Stipulation agreed that Sovernet's ETC application satisfied the applicable statutory criteria under 47 U.S.C. § 214(e) in the State of Vermont, and recommended that it be granted by the Board, by an Order that approves, accepts and adopts the conditions described therein. FairPoint elected not to sign the Stipulation. Sovernet then asked the Board to schedule a hearing for purposes of resolving the matter.

3. On October 4, 2010, Gerald R. Tarrant, Esq., filed a Notice of Appearance on behalf of Sovernet.

I convened a status conference on January 10, 2011, to determine how to proceed with the Docket in light of the filing of the Stipulation. Sovernet, the Department, the Independents and FairPoint all appeared at the status conference and all agreed to the admission into the record of the prefiled testimony filed on behalf of the parties. No party requested a technical hearing. As a result, no technical hearings are required to resolve this matter.

III. LEGAL STANDARD

Before a "telecommunications carrier"⁴ may receive federal universal service support, it must first be designated as an ETC.⁵ The Vermont Public Service Board has authority under the Act to designate ETCs in Vermont. The Act and its implementing regulations prescribe many of the standards for such designations ("ETC Requirements").⁶

A carrier seeking designation must show that it offers nine supported services: voice grade access to the public switched network; local usage; dual tone multi-frequency signaling or its equivalent; single-party service; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll limitation.⁷ These nine services must be offered throughout the service area for which the designation is received, either using the ETC's own facilities or a combination of its own facilities and resale of another carrier's services.⁸ The ETC must also advertise the availability of these services and the charges for those services using media of general distribution.⁹

Additionally, prior to designating a competitive telecommunications carrier as an ETC the Board must first find that such designation is "consistent with the public interest, convenience and necessity."¹⁰ In a 2005 order, the FCC interpreted this requirement to mean that designation must serve the public interest, and established an analytical framework it would use in reviewing

4. "Telecommunications carrier" is defined by 47 C.F.R. § 54.5.

5. 47 U.S.C. § 214(e); 47 C.F.R. § 54.201.

6. The standards are found generally in 47 C.F.R. § 54.101, *et seq.*

7. 47 C.F.R. § 54.101(a) & (b).

8. 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

9. *Id.*

10. 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(c).

ETC applications to insure designations were in fact in the public interest.¹¹ In that same order, the FCC also created additional minimum eligibility requirements that applicants must meet before receiving ETC designation,¹² strengthened annual reporting requirements for ETCs,¹³ and encouraged states to implement the same requirements and analytical framework in determining whether to designate a carrier as an ETC when applications are reviewed by state commissions.¹⁴ These various requirements are discussed in detail in Section X of this proposed decision.

IV. POSITIONS OF THE PARTIES

Sovernet, the Independents and the Department have all signed the Stipulation supporting Board designation of Sovernet as an ETC subject to certain enumerated conditions. FairPoint has declined to sign the Stipulation but has not expressed any opposition to its approval by the Board.

V. COMPANY BACKGROUND

Findings

1. Sovernet is a facilities-based competitive local exchange carrier ("CLEC") with its principal place of business at 5 Canal Street, Bellows Falls, Vermont. Lackey pf. at 3.
2. Sovernet has been providing both residential and business voice telecommunications service in Vermont since 2001, and currently serves approximately 14,000 access lines located throughout FairPoint's Vermont study area. FairPoint is classified as a "non-rural" carrier by the FCC. Lackey pf. at 3.
3. Sovernet provides certain telecommunications services in Vermont, within the meaning of Section 203(5) of Title 30 of the Vermont Statutes Annotated, owns and operates public-service property in connection therewith within the meaning of Section 201 of Title 30, and therefore is subject in certain respects to the Board's jurisdiction. Petition at 1-2.

11. See *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) at ¶ 3 ("Guidelines Order").

12. Guidelines Order at ¶ 2.

13. Guidelines Order at ¶ 4.

14. Guidelines Order at ¶¶ 1, 3 and 4.

4. Sovernet holds a Certificate of Public Good (CPG No. 527-CR) authorizing it to provide facilities-based and resold telecommunications services in Vermont, including service to the local exchange. Petition at 2.

5. Sovernet is a telecommunications carrier as defined by Section 153(44) of Title 47 of the United States Code and Section 51.5 of Title 47 of the Code of Federal Regulations, is a telecommunications carrier for the purposes of Part 54 of the FCC's rules, and therefore is considered to be a common carrier under the Act. Petition at 2.

VI. THE NINE REQUIRED SERVICES

The services supported by the federal Universal Service Fund are: (a) voice-grade access to the public-switched network; (b) local usage; (c) dual-tone, multi-frequency signaling or its functional equivalent; (d) single-party service or its functional equivalent; (e) access to emergency services; (f) access to operator services; (g) access to interexchange service; (h) access to directory assistance; and (i) toll limitation for qualifying low-income consumers.¹⁵ Each of the nine required services is considered separately below.

A. Voice Grade Access to the Public Switched Network

Findings

6. Sovernet offers voice grade access to the public switched telephone network by two means. First, in instances where Sovernet provides voice grade access through a combination of its own facilities and use of another carrier's facilities, Sovernet provides service using its Metaswitch VP3510 in combination with either unbundled network element loops ("UNE Loops") or Enhanced Extended Local Loops ("EEL's") purchased from FairPoint. Second, Sovernet purchases local exchange service from FairPoint pursuant to an interconnection agreement and resells those services as voice grade access service. Through its interconnection arrangements with FairPoint and tariffed exchange arrangements with other local exchange

15. 47 C.F.R. § 54.101(a).

carriers, Sovernet customers are able to make and receive calls on the public switched network within the specified bandwidths of 300 to 3,000 Hertz. Lackey pf. at 4-5.

Discussion

"Voice grade access" is defined as a "functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call."¹⁶ For the purposes of Part 54 of the FCC's regulations, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz.¹⁷ Sovernet meets this requirement.

B. Local Usage

Findings

7. Sovernet offers unlimited flat-rate local calling access to customers it serves using its own switch. When serving customers through resale of another carrier's services, Sovernet offers the option to purchase local service that includes a monthly local usage allowance. Lackey pf. at 5.

8. Sovernet's local and Extended Area Service plans are consistent with those established by the Board for determining intercarrier compensation, and are the same as FairPoint's. Lackey pf. at 5.

9. As an ETC, Sovernet has committed to comply with any and all minimum local usage requirements under applicable law. Lackey pf. at 5.

Discussion

"Local usage" is defined as the "amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users."¹⁸ Although the rule has been in effect since 1998, the FCC has never actually prescribed a minimum quantity of local usage. However,

16. 47 C.F.R. § 54.101(a)(1).

17. 47 C.F.R. § 54.101(a)(1).

18. 47 C.F.R. § 54.101(a)(2).

in 2005, the FCC mandated that an ETC applicant must demonstrate that it offers a local usage plan comparable to one offered by the incumbent local exchange carrier ("LEC") in the service area for which designation is sought. As in past orders, the FCC declined to specify an actual minimum amount of local usage.¹⁹ In the absence of a specific minimum threshold, it is necessary to examine each application on a case-by-case basis to determine if the local usage requirement is met.²⁰

I conclude that Sovernet meets the local usage requirement through its provision of unlimited flat-rate local calling to customers it serves using its own switch and offering customers served through resale the option to purchase local service that includes a monthly local usage allowance. Additionally, Sovernet has committed to comply with any future local usage requirements imposed under applicable law, something the FCC has already deemed relevant to meeting the local usage requirement.²¹

C. Dual Tone, Multi-Frequency Signaling

Findings

10. Sovernet provides dual tone, multi-frequency ("DTMF") signaling. Its network is fully DTMF compliant. Lackey pf. at 5.

Discussion

DTMF is defined as a "method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time."²² It is undisputed that Sovernet satisfies this requirement.

19. Guidelines Order at ¶ 32. The FCC made clear that state commissions are free to prescribe some amount of local usage as a condition of ETC designation. *Id.* at ¶ 34.

20. Guidelines Order at ¶ 33.

21. *See Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier for the State of Virginia*, CC Docket No. 96-45, Memorandum and Opinion and Order, FCC 03-338 (rel. Jan. 22, 2004), para. 20 (January 22, 2004).

22. 47 C.F.R. § 54.101(a)(3).

D. Single-Party Service or its Functional Equivalent

Findings

11. Sovernet offers single-party service or its functional equivalent. Lackey pf. at 6.

Discussion

"Single-party service" is defined as "telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission."²³ It is undisputed that Sovernet satisfies this requirement.

E. Access to Emergency Services

Findings

12. Sovernet provides access to both 911 and enhanced 911 (E-911), and is fully interconnected with the E-911 network managed by the Vermont Enhanced 9-1-1 Board and with its component public-safety answering points serving the area for which designation is sought. Lackey pf. at 6.

Discussion

"Access to emergency services" includes access to 911,²⁴ and where a state has implemented E-911,²⁵ access to E-911 is required.²⁶ Because Vermont has implemented

23. 47 C.F.R. § 54.101(a)(4).

24. 911 is defined as a "service that permits a telecommunications user, by dialing the three-digit code '911,' to call emergency services through a Public Service Access Point ("PSAP") operated by the local government." 47 C.F.R. § 54.101(a)(5).

25. Enhanced 911 is defined as "911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party." 47 C.F.R. § 54.101(a)(5).

26. 47 C.F.R. § 54.101(a)(5).

statewide E-911, Sovernet therefore must provide access to E-911 services. Sovernet meets this requirement.

F. Access to Operator Services

Findings

13. Sovernet provides access to operator services under a contractual arrangement with an operator-services provider. Lackey pf. at 7.

Discussion

"Access to operator services" is defined as "access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call."²⁷ It is undisputed that Sovernet satisfies this requirement.

G. Access to Interexchange Services

Findings

14. Sovernet provides access to interexchange services by offering its own long-distance service. Customers may also "dial around" to reach their interexchange carrier of choice for those carriers that have provisioned appropriate facilities and support such services. Lackey pf. at 7.

15. Sovernet also acknowledges that it may be required to provide equal access to long-distance carriers in the areas for which it seeks ETC designation in the event no other ETC is providing equal access service in those areas. Lackey pf. at 7.

Discussion

"Access to interexchange service" is defined as the "use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these

27. 47 C.F.R. § 54.101(a)(6).

network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network."²⁸

Sovernet provides access to interexchange services through its own long-distance offerings, as well as by allowing customers to reach other long-distance providers through dial-around service. Additionally, consistent with the Guidelines Order, Sovernet has acknowledged that it may be required to provide equal access to long-distance carriers in the areas for which it seeks ETC designation in the event no other ETC is providing equal access service in those areas.²⁹

Based on the foregoing, I conclude that Sovernet provides access to interexchange services consistent with the requirements for ETC designation.

H. Access to Directory Assistance

Findings

16. Sovernet provides directory assistance to customers who dial "411" or "1+ NPA + 555-1212." Sovernet also provides, through contractual arrangements with the incumbent carrier, listings in the white pages telephone directory for the general area. Lackey pf. at 8.

Discussion

"Access to directory assistance" is defined as "access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings."³⁰ It is undisputed that Sovernet satisfies this requirement.

I. Toll Limitation for Qualifying Low-Income Customers

Findings

17. Sovernet currently provides toll limitation by utilizing its toll-blocking capabilities for customers who request such services, and will offer the same to customers that meet Lifeline

28. 47 C.F.R. § 54.101(a)(7).

29. Guidelines Order at ¶ 69.

30. 47 C.F.R. § 54.101(a)(8).

qualifications upon designation as an ETC. Sovernet does not have the capability to offer toll control. Lackey pf. at 8-9.

Discussion

"Toll blocking" is a service provided by carriers that allows customers to elect not to allow the completion of outgoing toll calls.³¹ "Toll control" is a more complex service that would allow a customer to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or per billing cycle.³²

An ETC can comply with federal requirements by providing toll blocking, so long as it remains incapable of also providing toll control.³³ Because Sovernet does not have the capability to provide toll control, it satisfies this requirement by providing toll blocking.

VII. LIFELINE AND LINK-UP

Findings

18. Upon designation as an ETC, Sovernet will provide the Lifeline discount against monthly recurring dial-tone and subscriber line charges for qualifying residential service selected by eligible subscribers. Lackey pf. at 10.

19. Upon designation as an ETC, consistent with guidelines for the federal Link-Up program, Sovernet will discount qualifying installation fees for new service establishment for residential customers eligible to receive the Lifeline discount. The discount is 50% off the service initiation charge, up to a maximum of \$30. Lackey pf. at 10.

31. 47 C.F.R. § 54.400(b).

32. 47 C.F.R. § 54.400(c).

33. 47 C.F.R. §§ 54.101(a)(9) and 54.400(d). An ETC that is capable of providing both services must provide both. 47 C.F.R. § 54.400(d).

Discussion

FCC rules require ETCs to offer Lifeline and Link-Up to their customers and to advertise the availability of the two programs.³⁴ The evidence of record supports a conclusion that Sovernet will offer Lifeline and Link-Up to qualifying customers upon designation as an ETC. However, I am concerned that Sovernet may have overlooked its obligation to advertise the availability of these two programs. Sovernet has committed to advertising the availability of the nine supported services; however, the supported services do not include Lifeline and Link-Up and therefore it is not clear what Sovernet's intentions are with respect to advertising for these two programs. Accordingly, I recommend that the Board condition any designation on the requirement that Sovernet advertise the availability of the Lifeline and Link-Up programs in media of general distribution in the designation area, and in a manner that is reasonably likely to alert qualified individuals to the existence of these programs.

VIII. OFFERING SERVICES THROUGHOUT THE SERVICE AREA

Findings

20. Sovernet is committed to ensuring that the supported services will be available throughout the service area for which it seeks designation to all customers who make a reasonable request for service. Lackey pf. at 3.

21. Sovernet provides service through the use of its own facilities as well as through a combination of its own facilities and the resale of another carrier's wireline services. Lackey pf. at 3.

22. Sovernet will invest high-cost support in the expansion and upgrade of its network to provide facilities-based services, and will continue to utilize resale services to meet its service obligations in those instances where it currently lacks its own facilities. Lackey pf. at 3-4.

Discussion

The nine supported services must be "offered" throughout the service area for which ETC

34. 47 C.F.R. §§ 54.405, 54.411.

designation is received.³⁵ This can be accomplished using the ETC's own facilities or a combination of its own facilities and resale of another carrier's services.³⁶ Because Sovernet will provide service through resale of the incumbent's services in those instances where Sovernet cannot provide service through the use of its own facilities, I conclude that Sovernet's service offering will be coextensive with that of FairPoint in the areas for which Sovernet seeks designation. Accordingly, I also conclude that Sovernet meets this requirement.

IX. ADVERTISING

Findings

23. Sovernet will advertise the availability of the nine supported services and the charges therefore, using media of general distribution throughout the service area for which it seeks designation. The methods of advertising may include newspapers, magazines, radio or television as well as other methods that constitute media of general distribution in the area. Lackey pf. at 9.

Discussion

The Act and FCC rules condition ETC designation on the carrier advertising the availability of the nine services required for designation.³⁷ Sovernet's commitment to advertise its services throughout the designation area using media of general distribution satisfies this requirement.

However, FCC rules also require ETCs to advertise the availability of the Lifeline and Link-Up programs throughout their designated service areas.³⁸ As noted earlier, Sovernet's commitment to advertising appears to extend only to the nine supported services and the company has made no specific representation with respect to advertising for Lifeline and Link-Up. Accordingly, I reiterate my recommendation that the Board condition any designation on the requirement that Sovernet advertise the availability of the Lifeline and Link-Up programs in

35. 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d).

36. *Id.*

37. 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201.

38. 47 C.F.R. §§ 54.405, 54.411.

media of general distribution in the designation area, and in a manner that is reasonably likely to alert qualified individuals to the existence of these programs.

X. PUBLIC INTEREST

Prior to designating a competitive telecommunications carrier as an ETC the Board must first determine that such designation is "consistent with the public interest, convenience and necessity."³⁹ In a 2005 order, the FCC interpreted this requirement to mean that designation must serve the public interest, and established an analytical framework it would use in reviewing ETC applications to insure designations were in fact in the public interest.⁴⁰ In that same order, the FCC also created additional minimum eligibility requirements that applicants must meet before receiving ETC designation,⁴¹ strengthened annual reporting requirements for ETCs,⁴² and encouraged states to implement the same requirements and analytical framework in determining whether to designate a carrier as an ETC when applications are reviewed by state commissions.⁴³

In examining whether an ETC designation would serve the public interest, the FCC engages in a fact-specific analysis that examines a variety of factors, including potential benefits from increased consumer choice, and the unique advantages and disadvantages of the applicant's service offerings.⁴⁴

With respect to the additional minimum eligibility requirements, an ETC applicant must demonstrate: (1) the commitment and ability to provide the nine supported services throughout the designated service area by providing service to all requesting customers within that area and by submitting a formal network improvement plan that demonstrates how universal service funds

39. 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(c).

40. Guidelines Order at ¶ 3.

41. Guidelines Order at ¶ 2.

42. Guidelines Order at ¶ 4.

43. Guidelines Order at ¶¶ 1, 3 and 4.

44. Guidelines Order at ¶ 41. In cases where an applicant is seeking designation below the study area level of a rural telephone company, the FCC also engages in a "cream-skimming" analysis by comparing population densities of wire centers for which designation is sought against those for which designation is not sought. *Id.* Sovernet's application does not involve the service territory of any rural telephone companies so the cream-skimming analysis is not relevant in this proceeding.

will be utilized to expand and improve its network;⁴⁵ (2) the ability to remain functional in emergency situations;⁴⁶ (3) a commitment to meeting applicable consumer protection and service quality standards;⁴⁷ and (4) its offering of a local usage plan comparable to the one offered by the incumbent LEC in the service area for which designation is sought.⁴⁸ While the FCC declined to impose a general requirement for ETCs with respect to equal access to long-distance carriers, it stated that "ETC applicants should acknowledge that we may require them to provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within the service area."⁴⁹

The strengthened annual reporting requirements require ETCs to provide on or before each October 1st: (1) a progress report on the ETC's five-year improvement plan; (2) detailed information on any outages lasting more than 30 minutes; (3) the number of requests for service that went unfulfilled during the past year; (4) the number of complaints received per 1,000 headsets or lines; (5) certification that the ETC is complying with applicable service-quality standards and consumer-protection rules; (6) certification that the ETC is capable of functioning in emergency situations; (7) certification that the ETC is offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas; and (8) certification that the carrier acknowledges the FCC may require it to provide equal access to long-distance carriers in its designated service area in the event that no other ETC is providing equal access within that service area.⁵⁰

In this section, I will start with an examination of the additional minimum eligibility requirements, follow with an examination of the strengthened reporting requirements, and then conclude with the public-interest analysis.

45. Guidelines Order at ¶ 21.

46. Guidelines Order at ¶ 25.

47. Guidelines Order at ¶ 28.

48. Guidelines Order at ¶ 32.

49. Guidelines Order at ¶ 35.

50. Guidelines Order at ¶ 69.

A. Minimum Eligibility Requirements

Findings

24. Sovernet has committed to providing the supported services throughout the area for which it seeks designation, and has agreed to file a five-year plan, within 60 days of any Board order designating Sovernet an ETC, demonstrating how high-cost universal service support will be used to improve its coverage, service quality or capacity in every wire center for which it seeks designation and expects to receive universal service support . Lackey pf. at 3-4; Stipulation at ¶ 7.a.

25. To demonstrate its ability to remain functional in emergency situations, Sovernet will file its disaster-recovery plan with the Board as a condition to designation as an ETC within 60 days of any Board order designating Sovernet an ETC. Stipulation at ¶ 7.b.

26. Sovernet has agreed that it shall be subject to the Retail Service Quality Standards established in Docket No. 5903, Order of 7/2/99, to the extent those standards have not been superseded by administrative rules subsequently adopted by the Board. Additionally, Sovernet acknowledges that it is subject to the standards of PSB Rule 3.200 and the standards of PSB Rule 7.600. Stipulation at ¶ 1.b.-d.

27. Sovernet has agreed to offer local usage plans comparable to those offered by the incumbent local exchange carrier in the areas for which it seeks designation. Stipulation at ¶ 7.c.

28. Sovernet has acknowledged that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to 47 U.S.C. § 214(e)(4) of the Communications Act of 1934. Stipulation at ¶ 7.d.

Discussion

The above findings demonstrate that Sovernet meets the additional minimum eligibility requirements established in the FCC's 2005 Guidelines Order.

B. Strengthened Annual Reporting Requirements

Findings

29. Sovernet has agreed to file with the Board and Department, on an annual basis, on or

before April 15, a federal-support summary designed to assist the Board in determining whether to make a certification on or before the first day of each October for support to be received in the following year. The summary will include the following information:

- a. Number of residential, business and total voice access lines for which federal support is received:
 - i. in the preceding year; and
 - ii. for the current year.
- b. The amount of federal high-cost loop support received:
 - i. in the preceding year; and
 - ii. expected in the current year.
- c. The amounts of federal local switching support and acquired exchange ("Safety Valve") support received:
 - i. in the preceding year; and
 - ii. expected in the current year.
- d. A listing of which exchanges high-cost funding is being used in, as well as the purposes and principal projects for which funds are being used:
 - i. in the preceding year; and
 - ii. expected in the current year.
- e. A draft of the customer notice that will be distributed in the first quarter of the following year describing the effects of federal support on customer rates.

Stipulation at ¶ 2.

30. Additionally, Sovernet has agreed to file annually, on or before September 1, a supplemental federal summary update that reports any known and measurable changes to the information reported in the federal-support summary filed the previous April 15. Both the federal-support summary and the federal support update will be in the form of an affidavit. The information, including the affidavit, may be filed under seal with a request to maintain confidentiality, subject to Board confidentiality protocols. Stipulation at ¶ 2.

31. Sovernet has also agreed to provide notice to the Board and Department within 30 days if information it previously submitted with respect to its provision of the nine supported services

or its advertising for those services is no longer correct. Stipulation at ¶ 3.

Discussion

Sovernet and the other parties to the Stipulation have agreed to certain annual reporting requirements to facilitate Board review with respect to the annual certification process. These reporting requirements are akin to the annual reporting requirements imposed on the Independents in Docket 6530⁵¹ and therefore are consistent with the concept of competitive neutrality.

However, Sovernet does not propose, and the Stipulation does not address, any mechanisms for meeting the strengthened annual reporting requirements established in the FCC's 2005 Guidelines Order. Those requirements include: (1) a progress report on the ETC's five-year improvement plan; (2) detailed information on any outages lasting more than 30 minutes; (3) the number of requests for service that went unfulfilled during the past year; (4) the number of complaints received per 1,000 headsets or lines; (5) certification that the ETC is complying with applicable service-quality standards and consumer-protection rules; (6) certification that the ETC is capable of functioning in emergency situations; (7) certification that the ETC is offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas; and (8) certification that the carrier acknowledges the FCC may require it to provide equal access to long distance carriers in its designated service area in the event that no other ETC is providing equal access within that service area.⁵²

At this time, I do not recommend the Board impose any additional reporting requirements on Sovernet beyond those agreed to in the Stipulation for two reasons. First, while the FCC encourages state commissions to impose these strengthened reporting requirements, it is not mandatory, and the FCC recognized that states are uniquely positioned to know what information is necessary in order to determine whether ETCs are fulfilling their obligations.⁵³ Second, the

51. *Investigation into State Certification of Compliance by Nine Rural Telephone Companies with Subsection 254(e) of the Telecommunications Act of 1996*, Docket 6530, Order of 9/26/01 at 20-21.

52. Guidelines Order at ¶ 69.

53. Guidelines Order at ¶ 71.

FCC noted in the Guidelines Order that these new requirements should not be imposed only on new ETC applicants, but should be imposed on all ETCs to ensure competitive neutrality.⁵⁴ Accordingly, rather than impose these additional reporting requirements on Sovernet in this proceeding, I recommend that the Board accept the reporting requirements in the Stipulation, and if it determines additional reporting requirements are warranted, I recommend that it commence a process whereby new requirements could be considered and then imposed equally on all ETCs operating in Vermont.

Lastly, whether the annual federal-support summary and federal summary update would be entitled to confidential treatment will be determined under the provisions of Vermont's access to public records law. Therefore, I recommend that the Board make clear that when Sovernet files its annual federal-support summary and federal summary update, that any request for confidential treatment of information contained in those documents must be supported by a detailed averment explaining why the information subject to the request is exempt from disclosure under Vermont's access to public records law, 1 V.S.A. § 315 et seq.

C. Public Interest

In its 2005 Guidelines order, the FCC stated that in examining whether an ETC designation would serve the public interest, it engages in a fact-specific analysis that examines a variety of factors, including potential benefits from increased consumer choice, and the unique advantages and disadvantages of the applicant's service offerings.⁵⁵ In making its public-interest determination, the FCC also considers any impacts that a designation would have to the high-cost support fund.⁵⁶

Findings

32. If the Board designates Sovernet as an ETC, the company would receive approximately

54. *Id.*

55. Guidelines Order at ¶ 41. As mentioned in a prior footnote, the FCC also engages in a cream-skimming analysis in certain situations, none of which are applicable to Sovernet's petition.

56. Guidelines Order at ¶¶ 54-57.

\$75,000 per year in federal high-cost support, based on current subscriber counts. Lackey pf. at 14.

33. Sovernet would use the federal high-cost support to invest in the development, maintenance, and operation of its network to provide voice and other communications services to customers in the regions for which Sovernet seeks ETC designation. Lackey pf. at 9.

34. Expansion of Sovernet's network will offer increased consumer choices and competition for some customers. Additionally, while the competitive and consumer benefits will be greatest in areas where Sovernet has or will have equipment collocated in a central office, designation will improve the business case for furnishing full-featured services even where Sovernet has not yet collocated in a central office. This is because EELs or special access circuits connected back to the nearest Sovernet central office can be used to deliver any of the services the company's soft switch can provide. Lackey pf. at 9-10.

35. Sovernet employs an experienced engineering and technical support team located at Sovernet's Network Operations Centers in Winooski and Bellows Falls, Vermont, that monitors service quality and service outages across Sovernet's network, providing on-call emergency support 24 hours a day, seven days a week. Lackey pf. at 10.

36. Designation of Sovernet as an ETC will not reduce the amount of universal service support that any other carrier in Vermont is presently receiving. The interim cap imposed by the FCC on high-cost support applies state-to-state and only to support provided to Competitive Eligible Telecommunications Carriers ("CETCs"), and no CETC is currently receiving high-cost support in areas of Vermont. Additionally, designation of Sovernet as an ETC will not reduce the amount of high-cost support (or any type of universal service support) for which incumbent Vermont local exchange companies qualify. Lackey pf. at 11.

37. CETCs are presently drawing no money in universal service support in Vermont. CETC RCC Atlantic last drew a full amount of support in January 2009, with various adjustments to its account being made for the next nine months. RCC Atlantic has not received a high-cost disbursement since November 2009. Lackey pf. at 14.

38. Sovernet's designation will not burden the federal Universal Service Fund. Based on current subscriber accounts, Sovernet estimates that it would receive roughly \$75,000 per year in

federal high-cost support — less than two-thousandths of a percent of the \$4.4 billion high-cost fund. Lackey pf. at 14.

Discussion

Designation of Sovernet as an ETC will serve the public interest because expansion of Sovernet's own network and the increasing availability of full-featured services will provide increased consumer choices and may have positive competitive effects in some areas of FairPoint's service territory. Additionally, the designation would not cause any impacts to the amount of support currently available to Vermont's incumbent carriers, nor would it have any significant impact on the overall health of the high-cost support fund due to the relatively small amount of support Sovernet will receive.

On balance, I conclude that Sovernet's designation will result in some benefits accruing to some Vermonters. While I cannot conclude, based on the evidence presented, that these benefits will be substantial, they are sufficient to warrant designation, especially in light of the lack of negative impacts that would flow from the designation.

XI. THE STIPULATION AND AGREEMENT

Findings

39. On December 14, 2010, Sovernet filed a Stipulation and Agreement executed by itself, the Department, and the Independents. The remaining party to the proceeding, Fairpoint, did not execute the Stipulation. Stipulation generally.

40. The parties that executed the Stipulation agree that Sovernet's ETC application meets the applicable statutory criteria under 47 U.S.C. § 214(e) in the State of Vermont and recommend that the Board designate Sovernet as an ETC subject to a number of conditions. Stipulation at ¶ 1.

41. The proposed conditions address Sovernet's obligations with respect to the Lifeline and Link-Up programs, retail service quality standards and consumer protection, annual reporting requirements detailing receipt and expenditure of high-cost funds, the process for renewal of Sovernet's designation, ensuring the Board and Department are in possession of accurate

information regarding Sovernet's obligations as an ETC, and mechanisms to address some of the criteria established in the FCC's Guidelines Order.⁵⁷ Stipulation generally.

Discussion

I recommend that the Board approve the Stipulation and incorporate into its order the various terms and conditions that impose obligations on Sovernet. These terms and conditions address some areas of uncertainty and some shortcomings contained in Sovernet's original petition. Approval of these terms and conditions will help insure that Sovernet's designation serves the public interest and gives the parties and the Board certainty about what is expected of Sovernet and how its designation will be handled going forward.

XII. CONCLUSION

Based on the preceding findings and discussion, I conclude that Sovernet will provide the services that are supported by the federal universal service support mechanisms, on a non-discriminatory basis, using its own facilities or a combination of its own facilities and resale of another carrier's services, and it will advertise the availability of such services. I also conclude that designating Sovernet as an ETC is in the public interest, that Sovernet has the ability to remain functional in emergencies, and that it is likely to meet the state's consumer-protection requirements.

I also conclude that the designation should be subject to the conditions described in this proposed Order, which are necessary to protect the public interest.

This Proposal for Decision has been served on all parties to this proceeding in accordance with 3 V.S.A. § 811.

57. These various obligations are discussed in detail in other sections of this proposed decision. Therefore, I am not describing them here in detail.

Dated at Montpelier, Vermont, this 14th day of March, 2011.

s/ John J. Cotter

John J. Cotter, Esq.
Hearing Officer

XIII. BOARD DISCUSSION

On March 14, 2011, the Hearing Officer issued his Proposal for Decision ("PFD") in this proceeding. In large part, the proposed decision accepted the terms of a stipulation between Sovernet, the Department of Public Service and the Independents. The proposed decision, however, did impose a condition on Sovernet, consistent with federal regulations,⁵⁸ that Sovernet be required to "advertise the availability of the Lifeline and Link-Up programs in media of general distribution in the designation area, and in a manner that is reasonably likely to alert qualified individuals to the existence of these programs."⁵⁹ While we concur with this requirement, we are taking this issue one step further and requiring Sovernet to file, within 60 days of this Order, a plan for review and approval by the Board that describes the marketing and outreach efforts it will utilize in advertising the availability of the two services, and explains how it will be effective in reaching eligible consumers. Additionally, we are requiring Sovernet to file an annual certification describing the marketing and outreach efforts it undertook the preceding year along with the federal-support summary that it files each April 15.

On November 4, 2010, the Federal-State Joint Board on Universal Service ("Joint Board") released a recommended decision recommending to the FCC that it adopt mandatory outreach requirements for all ETCs that receive low-income support from the Universal Service Fund. The proposed requirements would constitute a minimum floor that must be met by ETCs. Under the proposal, states could supplement the federal requirements with additional outreach rules designed to better target their own populations. However, the Joint Board found "it is imperative that a baseline level of Lifeline and Link Up information be available to low income consumers in all states."⁶⁰

The Joint Board was concerned that, although the FCC had issued detailed outreach guidelines in April 2004, Lifeline participation rates had not increased in a significant manner since that time. "In 2009, the nationwide Lifeline participation rate was 36 percent and, in some

58. 47 C.F.R. §§ 54.405(b), 54.411(d).

59. PFD at 12, 14, 27.

60. *In the Matter of Federal-State Joint Board on Universal Service Lifeline and Link Up*, CC Docket No. 96-45 at ¶ 60 (rel. Nov. 4, 2010) ("Recommended Decision").

states less than 10 percent of eligible consumers participated in the program." Such statistics, the Joint Board said, "raise concerns that ETCs are not using effective low income outreach methods, or that, in some instances, ETCs are neglecting low-income outreach altogether."⁶¹

As a result, the Joint Board recommended the creation of mandatory outreach requirements, and suggested the FCC seek comment on issues that should be addressed in ETCs' marketing efforts, such as ensuring that Lifeline and Link-Up information is clearly displayed on an ETC's website along with other services, utilization of multiple outreach methods,⁶² establishment of a frequency for outreach efforts, providing outreach materials to relevant community institutions, advertising in multiple languages if appropriate, use of clear and plain language, filing of an annual certification describing an ETC's outreach efforts for the preceding year, and possible cooperation among ETCs for the joint production, placement and use of outreach materials.⁶³

Given the significant concerns about the effectiveness of current Lifeline and Link-Up outreach efforts we are directing Sovernet, as a condition of designation, to make the filings described above. The marketing and outreach plan should address the items raised in the Joint Board's recommended decision.

We are also directing Sovernet to provide information that explains the types of customer complaints that it tracks in addition to network trouble report rates. While we are not at this time imposing a complaint reporting requirement as a condition of designation, we may do so consistent with the Guidelines Order⁶⁴ after we review and understand how Sovernet tracks its customers' complaints.

Lastly, we are also writing to clarify an issue that was addressed in the proposed decision. The Public Interest section of the proposed decision contains the following statements:

"Designation of Sovernet as an ETC will not reduce the amount of universal

61. Recommended Decision at ¶ 59.

62. "This could include (but would not be limited to) any combination of print media, broadcast media, Internet advertising, and marketing materials distributed at community centers and other community-based organizations." Recommended Decision at ¶ 63.

63. Recommended Decision at ¶ 63.

64. Guidelines Order at ¶ 59.

service support that any other carrier in Vermont is presently receiving."⁶⁵

"Additionally, designation of Sovernet as an ETC will not reduce the amount of high-cost support (or any type of universal service support) for which incumbent Vermont local exchange companies qualify."⁶⁶

"Additionally, the designation would not cause any impacts to the amount of support currently available to Vermont's incumbent carriers . . .".⁶⁷

While these statements are technically correct that the designation, in and of itself, will not cause any impacts to the amount of support currently available to Vermont's incumbent carriers, they may be read by some to mean that FairPoint will never see any reduction in the amount of support it receives once Sovernet is operating with ETC status in FairPoint's service territory. This is not accurate. To the extent that Sovernet takes a customer from FairPoint and qualifies to receive support for serving that customer, FairPoint will see the amount of support it receives reduced by the amount associated with serving that customer.

The Hearing Officer has done a commendable job in addressing the issues and presenting his recommendations in the Proposal for Decision. With the modifications described in this section, the Board adopts the Hearing Officer's proposed findings and conclusions and hereby designates Sovernet an ETC subject to the conditions described in this Order.

65. PFD at 20-21, finding no. 36

66. PFD at 20-21, finding no. 36.

67. PFD at 21.

XIV. ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED by the Public Service Board ("Board") of the State of Vermont that:

1. The findings of fact and conclusions of the Hearing Officer are adopted, as modified above.
2. The Board hereby designates National Mobile Communications, Inc., d/b/a Sovernet Communications ("Sovernet"), as an Eligible Telecommunications Carrier ("ETC") under 47 U.S.C. § 214(e), with a Service Area consisting of the 92 wire centers listed in Attachment A to this Order.
3. Pursuant to 47 C.F.R. § 54.313(d)(vi), within 60 days of the date of this Order, the Board will certify to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company that Sovernet complies with 47 U.S.C. § 214(e) and is eligible for federal universal service support in 2011.
4. The designation expires December 31, 2012.
5. This Board retains continuing jurisdiction to review, modify, or revoke its designation of Sovernet as an ETC or to alter or amend the service area in all manners allowed to it under state and federal law, which may include dividing the service territory. This jurisdiction may be exercised on petition or at the discretion of the Board, in circumstances including but not limited to FCC alteration of the list of requirements for ETCs. The Board also reserves the right to alter service areas, including by dividing them or assigning to a rural carrier a service area other than its current study area.
6. Redesignation.
 - a. On or before October 1, 2012, Sovernet may file with the Board, with a copy to the Department of Public Service ("DPS"), a certification stating that it wishes to extend its designation beyond December 31, 2012. The certification shall also state that Sovernet continues to satisfy all of the requirements set forth in federal law for designation as an ETC (the "ETC Requirements"), including 47 C.F.R. § 54.101(a) as it may be amended from time to time;

b. On or before November 15, 2012, the DPS may object, stating that Sovernet does not continue to satisfy one or more of the ETC Requirements or has failed to comply with a condition of this Order ("Notice of Objection").

c. If no Notice of Objection is filed, the Board may issue a new designation Order extending the designation for an additional period.

d. If a Notice of Objection is filed, the Board shall provide Sovernet an opportunity for hearing. Sovernet will have the burden of demonstrating that it continues to satisfy the applicable ETC Requirements listed in the Notice of Objection. If it carries that burden, the Board may then renew the contested designation for an additional period.

e. During the pendency of any proceedings under this paragraph, the current designation shall be extended without further notice or order.

7. Non-Compliance. The DPS or the Board may at any time provide to Sovernet a written Notice of Possible Non-Compliance relating to one or more of the ETC Requirements. In that event, Sovernet shall within 30 days certify in writing to the Board, and deliver a copy to the DPS, that it continues to satisfy each of the ETC Requirements identified in the Notice of Possible Non-Compliance ("Claim of Continued Compliance"). The Board may revoke Sovernet's designation as an ETC or order such other remedies as the Board deems appropriate if either of the following occurs:

a. Sovernet fails to file a Claim of Continued Compliance; or

b. The Board determines, after opportunity for hearing, that Sovernet has not demonstrated that it continues to satisfy each of the ETC Requirements identified in the Notice of Possible Non-Compliance.

c. During the pendency of any proceedings under this paragraph, the current designation Order shall remain in effect.

8. Federal-Support Summary. Sovernet shall file with the Board and DPS, on an annual basis, on or before April 15, a federal-support summary designed to assist the Board in determining whether to make a certification on or before the first day of each October for support to be received in the following year. The federal-support summary shall be in the form of an affidavit and may be filed under seal with a request to maintain confidentiality and shall include

the following information:

- a. Number of residential, business and total voice access lines for which federal support is received:
 - i. in the preceding year; and
 - ii. for the current year.
- b. The amount of federal high cost loop support received:
 - i. in the preceding year; and
 - ii. expected in the current year.
- c. The amounts of federal local switching support and acquired exchange ("Safety Valve") support received:
 - i. in the preceding year; and
 - ii. expected in the current year.
- d. A listing of which exchanges high-cost funding is being used in, as well as the purposes and principal projects for which funds are being used:
 - i. in the preceding year; and
 - ii. expected in the current year.
- e. A draft of the customer notice that will be distributed in the first quarter of the following year describing the effects of federal support on customer rates.

Any request for confidential treatment of information contained in the federal-support summary must be supported by a detailed averment explaining why the information subject to the request is exempt from disclosure under Vermont's public records law, 1 V.S.A. § 315 et seq.

9. Supplemental Federal Summary Update. Sovernet shall file annually, on or before September 1, a supplemental federal summary update that reports any known and measurable changes to the information reported in the federal-support summary filed the previous April 15. The supplemental federal summary update will be in the form of an affidavit, and may be filed under seal with a request to maintain confidentiality. Any request for confidential treatment of information contained in the supplemental federal summary update must be supported by a detailed averment explaining why the information subject to the request is exempt from

disclosure under Vermont's public records law, 1 V.S.A. § 315 et seq.

10. Additional Filings and Obligations. Sovernet shall:

- a. Within 60 days of this Order file with the Board, with a copy to the DPS, a five-year plan demonstrating how high-cost universal service support will be used to improve its coverage, service quality or capacity in every wire center for which it seeks designation and expects to receive universal service support.
- b. Within 60 days of this Order, file its disaster recovery plan with the Board, with a copy to the DPS.
- c. Offer local usage plans comparable to those offered by the incumbent local exchange carrier (LEC) in the areas for which it has received ETC designation.
- d. Acknowledge that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to 47 U.S.C. § 214(e)(4) of the Communications Act of 1934, as amended.
- e. Within 60 days of this Order file with the Board, with a copy to the DPS, a report describing the types of customer complaints that it tracks and how it tracks them in addition to network trouble report rates.

11. Sovernet shall provide notice to the Board and the DPS within 30 days if information it previously submitted with respect to its provision of the nine supported services or its advertising for those services is no longer correct.

12. Sovernet shall offer the Lifeline and Link-Up programs to qualifying customers and shall advertise the availability of the Lifeline and Link-Up programs in media of general distribution in the designation area, and in a manner that is reasonably likely to alert qualified individuals to the existence of these programs. Within 60 days of this Order, Sovernet shall file a plan for review and approval by the Board that describes the marketing and outreach efforts it will utilize in advertising the availability of the two services, and explains how it will be effective in reaching eligible consumers. Additionally, Sovernet shall file an annual certification describing the marketing and outreach efforts it undertook the preceding year along with the federal-support summary that it files each April 15.

13. Sovernet shall be subject to the Retail Service Quality Standards established in Docket No. 5903, Order of 7/2/99, to the extent those standards have not been superseded by administrative rules subsequently adopted by the Board. Additionally, Sovernet shall be subject to the standards of PSB Rule 3.200 and the standards of PSB Rule 7.600.

14. The Stipulation and Agreement by and among Sovernet, the DPS, and the Independents⁶⁸ is hereby approved. Sovernet shall comply with its terms and conditions except to the extent they are modified in this Order, in which case Sovernet shall comply with the modifications in this Order.

15. The preceding conditions may be modified by subsequent adopted and generally applicable administrative rules.

68. Franklin Telephone Company, Ludlow Telephone Company, Northfield Telephone Company, Perkinsville Telephone Company, Shoreham Telephone Company, Topsham Telephone Company, Inc., Vermont Telephone Company, Inc., d/b/a VTel, and Waitsfield-Fayston Telephone Company, Inc., d/b/a Waitsfield Telecom, d/b/a Champlain Valley Telecom.

Dated at Montpelier, Vermont, this 15th day of April, 2011.

<u>s/ James Volz</u>)	
)	PUBLIC SERVICE
)	
<u>s/ David C. Coen</u>)	BOARD
)	
)	OF VERMONT
<u>s/ John D. Burke</u>)	

OFFICE OF THE CLERK

FILED: April 15, 2011

ATTEST: s/ Judith C. Whitney
Deputy Clerk of the Board

NOTICE TO READERS: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Board (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: psb.clerk@state.vt.us)

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Board within thirty days. Appeal will not stay the effect of this Order, absent further Order by this Board or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Board within ten days of the date of this decision and order.

Attachment A - Wire Centers Included in Designation

<u>STATE</u>	<u>STUDY AREA CODE</u>	<u>ILEC</u>	<u>WIRE CENTER CLLI</u>	<u>WIRE CENTER NAME</u>
VT	145115	VERIZON-EAST	ARTNVTSC	ARLINGTON
VT	145115	VERIZON-EAST	BARNVTCH	BARNET
VT	145115	VERIZON-EAST	BARRVTEL	BARRE
VT	145115	VERIZON-EAST	BARTVTEL	BARTON
VT	145115	VERIZON-EAST	BETHVTMA	BETHEL
VT	145115	VERIZON-EAST	BGTNVTPL	BENNINGTON
VT	145115	VERIZON-EAST	BLFLVTHE	BELLOWS FALLS
VT	145115	VERIZON-EAST	BRBOVTMA	BRATTLEBORO
VT	145115	VERIZON-EAST	BRFDVTBC	BROOKFIELD
VT	145115	VERIZON-EAST	BRFRVTPG	BRADFORD
VT	145115	VERIZON-EAST	BRNDVTCA	BRANDON
VT	145115	VERIZON-EAST	BURLVTMA	BURLINGTON
VT	145115	VERIZON-EAST	CHLSVTMA	CHELSEA
VT	145115	VERIZON-EAST	CLBKNHMA	LEMINGTON (LOC)
VT	145115	VERIZON-EAST	CNCRVTMA	CONCORD
VT	145115	VERIZON-EAST	CSTNVTSO	CASTLETON
VT	145115	VERIZON-EAST	DAVLVTYA	DANVILLE
VT	145115	VERIZON-EAST	DRBYVTMA	DERBY
VT	145115	VERIZON-EAST	DRSTVTYA	DORSET
VT	145115	VERIZON-EAST	EFFDVTMA	E. FAIRFIELD
VT	145115	VERIZON-EAST	ENFLVTMA	ENOSBURG FALLS
VT	145115	VERIZON-EAST	ESJTVTLI	ESSEX JUNCTION
VT	145115	VERIZON-EAST	FARLVTML	FAIRLEE
VT	145115	VERIZON-EAST	FRFXVTMA	FAIRFAX

VT	145115	VERIZON-EAST	FRHNVMTMA	FAIR HAVEN
VT	145115	VERIZON-EAST	GDISVTYA	GRAND ISLE
VT	145115	VERIZON-EAST	GNBOVTGB	GREENSBORO
VT	145115	VERIZON-EAST	GVTNNHST	MAIDSTONE (LOC)
VT	145115	VERIZON-EAST	HNVRNHSC	NORWICH (LOC)
VT	145115	VERIZON-EAST	HRWKVTPK	HARDWICK
VT	145115	VERIZON-EAST	ISPNVTAL	ISLAND POND
VT	145115	VERIZON-EAST	JAMCVTMA	JAMAICA
VT	145115	VERIZON-EAST	JCVLVTSC	JACKSONVILLE
VT	145115	VERIZON-EAST	JFVLVTVA	JEFFERSONVILLE
VT	145115	VERIZON-EAST	JHSNVTRA	JOHNSON
VT	145115	VERIZON-EAST	LNBGVTEC	LUNENBURG
VT	145115	VERIZON-EAST	LNCSNHHI	GUILDHALL (LOC)
VT	145115	VERIZON-EAST	LYMENHYA	THETFORD (LOC)
VT	145115	VERIZON-EAST	LYVLVTCE	LYNDONVILLE
VT	145115	VERIZON-EAST	MDLBVTCC	MIDDLEBURY
VT	145115	VERIZON-EAST	MLTNVTEL	MILTON
VT	145115	VERIZON-EAST	MNCHVTSC	MANCHESTER
VT	145115	VERIZON-EAST	MRGNVTTO	MORGAN
VT	145115	VERIZON-EAST	MRVLVTUN	MORRISVILLE
VT	145115	VERIZON-EAST	MTPLVTSC	MONTPELIER
VT	145115	VERIZON-EAST	NADMMAASU	STAMFORD (LOC)
VT	145115	VERIZON-EAST	NSFRNHMA	BLOOMFIELD (LOC)
VT	145115	VERIZON-EAST	NWBYVTPC	NEWBURY
VT	145115	VERIZON-EAST	NWFNVTYA	NEWFANE
VT	145115	VERIZON-EAST	NWPTVTSE	NEWPORT
VT	145115	VERIZON-EAST	ORLNV TIR	ORLEANS
VT	145115	VERIZON-EAST	PLFDVTYA	PLAINFIELD
VT	145115	VERIZON-EAST	PLTNVTBE	POULTNEY

VT	145115	VERIZON-EAST	PRCTVTPI	PROCTOR
VT	145115	VERIZON-EAST	PTFDVTMA	PITTSFIELD
VT	145115	VERIZON-EAST	PTFRVTYA	PITTSFORD
VT	145115	VERIZON-EAST	PTNYVTCH	PUTNEY
VT	145115	VERIZON-EAST	PWNLVTBE	POWNAI
VT	145115	VERIZON-EAST	RCFRVTIN	RICHFORD
VT	145115	VERIZON-EAST	RDBOVTTU	READSBORO
VT	145115	VERIZON-EAST	RDNGVTMI	READING
VT	145115	VERIZON-EAST	RNDHVTPL	RANDOLPH
VT	145115	VERIZON-EAST	ROCHVTSP	ROCHESTER
VT	145115	VERIZON-EAST	RPRTVTGR	RUPERT
VT	145115	VERIZON-EAST	RTLDVTWE	RUTLAND
VT	145115	VERIZON-EAST	SHLBVTPH	SHELBURNE
VT	145115	VERIZON-EAST	SLBRVTBA	SALISBURY
VT	145115	VERIZON-EAST	SLNDVTYA	S. LONDONDERRY
VT	145115	VERIZON-EAST	SRTNVTAR	STRATTON
VT	145115	VERIZON-EAST	SRYLVTYA	S. ROYALTON
VT	145115	VERIZON-EAST	SSFRVTYA	S. STRAFFORD
VT	145115	VERIZON-EAST	STALVTBA	ST. ALBANS
VT	145115	VERIZON-EAST	STBYVTSM	ST. JOHNSBURY
VT	145115	VERIZON-EAST	STOWVTHI	STOWE
VT	145115	VERIZON-EAST	SWTNVTYO	SWANTON
VT	145115	VERIZON-EAST	TNBRVTYA	TUNBRIDGE
VT	145115	VERIZON-EAST	TROYVTYA	TROY
VT	145115	VERIZON-EAST	UNHLVTUC	UNDERHILL
VT	145115	VERIZON-EAST	VRGSVTMO	VERGENNES
VT	145115	VERIZON-EAST	WBURVTYA	W. BURKE
VT	145115	VERIZON-EAST	WDSTVTGO	WOODSTOCK
VT	145115	VERIZON-EAST	WDVLNHJL	WELLS RIVER (LOC)

VT	145115	VERIZON-EAST	WLMGVTDA	WILMINGTON
VT	145115	VERIZON-EAST	WLPLNHWP	WESTMINSTER (LOC)
VT	145115	VERIZON-EAST	WLTWVTLA	WILLIAMSTOWN
VT	145115	VERIZON-EAST	WNDSVTPI	WINDSOR
VT	145115	VERIZON-EAST	WNSKVTWA	WINOOSKI
VT	145115	VERIZON-EAST	WRBOVTYA	WARDSBORO
VT	145115	VERIZON-EAST	WRJTVTGA	WHITE RIVER JCT.
VT	145115	VERIZON-EAST	WRTLVTBA	W. RUTLAND
VT	145115	VERIZON-EAST	WSTWNHBS	CANAAN (LOC)
VT	145115	VERIZON-EAST	WTRBVTSW	WATERBURY